



# Neighborhood Council of Westchester Playa

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March 2, 2021

Los Angeles World Airports  
Ms. Evelyn Quintanilla  
Chief of Airport Planning II  
P.O. Box 92216  
Los Angeles, Ca. 90009-2216

Dear Ms. Quintanilla,

The Neighborhood Council of Westchester Playa has reviewed the DEIR for the Airfield and Terminal Modernization Project and has concluded that the project as currently presented poses grave adverse strain to the community and our quality of life. The combination of two distinct projects – Airfield Safety Modernization and the Terminal Expansion of adding two new terminals 0 and 9 – has given the incorrect impression that the entire project is about modernization. The project should be broken apart into two distinct projects- Airfield Modernization and Adding New Gates via Terminal Expansion. While we are supportive of the Airfield Modernization portion of the project, we are not in favor of Terminal Expansion. As such, the NCWP will not support the project as currently configured.

The various projects presented should be properly bifurcated and reintroduced individually for closer inspection of individual environmental and traffic impact data, consideration and to allow for oversight as “parts of the whole”.

In addition, this DEIR report exposes a potential serious overreach by LAWA. We have reached the point in which LAWA could be violating the “Spirit” of existing non-expansion agreements currently in place. Unfortunately, the bottom line is the DEIR reflects capacity and gate increases openly.

Our concerns are centered on the following areas – Air Quality; Greenhouse Gas Emissions; Noise; and Transportation Congestion. Proposed mitigation is not enough to overcome the determination of “Significant and Unavoidable” impacts to several key environmental measurements caused by the project. Environmental concern for Air Quality, Greenhouse Gas, Aircraft Noise and Transportation will be significant even after mitigation. The community will be exposed to these adverse impacts every day. For more detailed information, please refer to DEIR pages 1-24 and 1-25. We believe that most of the Air Quality increases will exceed guidelines from the SCAQMD.

Also, the new CEQA VMT (Vehicle Miles Traveled) calculations show significant increases that will directly increase traffic congestion around Westchester Playa. Total passenger VMT for 2019 was 6,581,811 and the 2028 forecast is 8,709,995 – a 32%

increase in miles traveled. This translates to total airport daily trip generation to and from the airport will go from 316,128 in 2019 to 407,942 in 2028 – a 29% increase in daily trips. With no mitigation, this will create significant traffic in our neighborhoods. And this is after LAMP will have been operational for 5 years.

Our other concerns are –

-MAP projections show a **30% increase in passenger count from 84.56 M in 2017 to 110.8M in 2028**. Further, annual aircraft operations will increase from **715,000 in FY2018 to 800,000 in FY2028**.

- The Midfield Satellite Concourse North added 12 north gates and has yet to be put into service. An additional 8 south gates will be constructed in the next few years at the already approved Midfield Satellite Concourse South. Further, it appears that the MSC EIR already took credit for a reduction in Western concourse gates (see MSC EIR). Therefore, the AMTP DEIR should be evaluated as **a gate increase of 18-27 new gates**.

- Specific Objectives of the Project cover Airfield improvement, Terminal improvements, Roadway System Improvements and Additional Objectives but **fails to cover any specific improvements to our community** which will bear the brunt of 26.24 M additional passengers and a significant 91,814 additional increase airport trips.

-**No increase in Public Services**.

-**No specific improvements to traffic intersections within the community**.

-**No penalties/fines if proposed mitigation does not reduce negative environmental impacts**

We believe that a CEQA EIR should not be based on providing the minimum mitigation needed for approval. But should be a forward-looking document on how “best” to balance the positive integration of a project into a community. And as such, here are items that we feel need to be added for us to re-consider our decision –

- Split the proposed project into two separate projects with separate EIR analysis for each project.
- VMT forecasts need to be monitored yearly with **penalties assessed for not meeting forecast reductions**. The penalties would go directly to mitigating traffic problems in the Westchester Playa community.
- Specific improvements to various streets and intersections -Sepulveda and Lincoln; Airport Boulevard between Arbor Vitae and La Tijera Boulevard; Aviation Boulevard between 111<sup>th</sup> Street and Century Boulevard; Aviation Boulevard between Arbor Vitae and La Cienega.

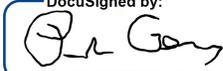
- Direct new roadways to the ITF-West to increase usage of LAMP and avoid the proposed left turn back up on Sepulveda
- Guarantee adoption and funding for LADOT non-CEQA traffic improvement and reduction recommendations from the upcoming report being analyzed based on DEIR traffic data.

In closing, The Neighborhood Council of Westchester Playa [NCWP] understands the importance of a safe, modern and efficient “world class airport”. And equally understands the needs of our residents to be protected from the unmitigated negative impacts of expanding airport operations. Unfortunately, the data poses tremendous unmitigated impacts and concerns to our neighborhood –

- LAX flight operations growing to 800,000 flights in 2028 from 715,000 in FY 2018.
- Construction of 2 new terminals with 18 to 27 gates combined
- Passenger increase to 110.8 million by 2018 (a 30 % increase over today) and increasing to 128 million by 2045 and
- Significant unavoidable environmental impacts to air quality, greenhouse gas emissions, noise and transportation
- No community benefits

We need to work together in making Los Angeles and all of California the best place to visit or live. We want LAX to be a “world class airport and a **first class neighbor**”. While we are supportive of the Airfield Modernization portion of the project, we are not in favor of Terminal Expansion. As such, the NCWP will not support the project as currently configured. The NCWP board is happy to reconsider our position if during the legislative approval process significantly more community benefits are included in the project.

Respectfully,

DocuSigned by:  


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Paula Gerez, NCWP President

cc: Mike Bonin, CD 11 Councilmember